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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PATRICK HEEGEL,

Plaintiff,

vs.

NEVADA PROPERTY 1 LLC, a Delaware
 limited liability company, doing business as
 THE COSMOPOLITAN OF LAS VEGAS,

Defendant.

Case No.: 2:20-cv-00001-APG-BNW

**STIPULATION AND ORDER TO
 EXTEND TIME TO RESPOND TO
 DEFENDANT'S MOTION FOR
 SUMMARY JUDGMENT**

(First Request)

Plaintiff PATRICK HEEGEL and Defendant NEVADA PROPERTY 1 LLC, a Delaware limited liability company, doing business as THE COSMOPOLITAN OF LAS VEGAS, , by and through their counsel of record, hereby STIPULATE AND AGREE to extend the deadline for Plaintiff to file his points and authorities in opposition to “Defendant Nevada Property 1, LLC’s Motion for Summary Judgment” (ECF No. 50) to **January 17, 2022**. This is an extension of two weeks. Defendant filed its motion for summary judgment on December 13, 2021. Pursuant to LR 7-2(b), the deadline for Plaintiff to file his opposition currently is set for January 3, 2022.

This is the first request to extend the deadline for filing the opposition to the now-pending motion for summary judgment.

There is good cause for entering into this stipulation for additional time. There is a large

1 volume of material to review in the process of preparing the opposition, due both to the volume of
2 material exchanged in discovery and the size of the motion that was filed. The extension also is
3 necessitated because of scheduling issues related to the holiday season. This stipulation and order
4 is sought in good faith and not for the purpose of delay.

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6 DATED: December 28, 2021.

DATED: December 28, 2021.

7 LAW OFFICES OF ROBERT P. SPRETNAK

FISHER & PHILLIPS LLP

8 By: /s/ Robert P. Spretnak
Robert P. Spretnak, Esq.

By: /s/ Lisa A. McClane
Lisa A. McClane, Esq.

9 Attorney for Plaintiff

Attorneys for Defendant

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11 Las Vegas, Nevada 89123

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14 IT IS SO ORDERED.

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16 UNITED STATES DISTRICT COURT JUDGE

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18 DATED: January 3, 2022
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